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June 2, 1997

DuPont Agricultural Products Global Registration Walker's Mill, Barley Mill Plaza P.O. Box 80038 Wilmington, DE 19880-0038 Fax (302) 992-6477

DuPont Agricultural Products

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Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460-0001

Dear 8(e) Coordinator:



Hydrazinecarboxylic Acid, Phenylmethyl Ester [Benzylcarbazate; CAS # 5331-43-1]

This letter is to inform you of the preliminary results of a recently conducted 28-day repeated dose toxicity test in male and female rats with the above referenced test substance.

This information was provided in a letter to us from a potential supplier based in Japan. The study was conducted in male and female rats at doses of benzylcarbazate of 0, 4, 13, 35 and 100 mg/kg. The following findings were noted:

"* Abnormal gait with dragging hindlimb, muscle atrophy of hindlimb and decrease in locomotor activity were observed in both sexes of the 100 mg/kg groups.

* Low value of body weight and food consumption were observed in both sexes of the 100 mg/kg group.

* Hematological examination revealed low value of hemoglobin, hematocrit, MCV and MCH in females of the 35 mg/kg groups.

* Blood chemical examination revealed low value of ALAT(GTP) in males of the 13 mg/kg groups and in females of the 35 mg/kg groups.

* By the microscopic examination, the change of the cerebellum, the peripheral nerve and femoral muscle were observed in both sexes of the 100 mg/kg groups.

* The NOEL is considered to be 4 mg/kg/day for males and 13 mg/kg/day for females under the conditions of the present study."

The effects described above are being reported in accordance with the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June, 1991).

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Sincerely,

Q. L. Mull

Ronald L. Mull, DVM, Ph.D. Regulatory Toxicologist

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